

Through no fault of LPG, Beech now seeks an extension of discovery deadlines due to her pending motion to compel. This is Plaintiff's own doing, seeking discovery of information clearly governed by the attorney-client privilege. Extending the discovery deadlines will be futile because Plaintiff is not entitled to any further documents because of the attorney-client privilege.

Accordingly, LPG respectfully requests that the Court deny Plaintiff's Motion to Extend Case Deadlines because it is futile.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been filed via the Court's electronic filing system on this 2nd day of December 2022. Notice of filing will be performed by the Court's electronic filing system, and Parties may access the document through the Court's electronic filing system.

/s/ Rebecca J. Mansell, Esq.

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Attorney for Defendant